

## CONTINUATION OF A CRIMINAL COMPLAINT

I, Richard J. Trask II, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since April 2011. As a Special Agent with the FBI, I have participated in, and conducted numerous investigations under the Domestic Terrorism, Counterterrorism, and Counterintelligence programs, to include espionage, terrorism, and domestic extremism investigations.

2. The facts in this affidavit come from my personal observations, training, experience, and information obtained from other agents, officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause to support the issuance of a criminal complaint and does not set forth all of my knowledge about this matter.

3. 18 U.S.C. § 875(c) makes it a felony to transmit, in interstate or foreign commerce, any communication containing any threat to injure the person of another. I have been advised that the defendant need not have the intent or present ability to carry out the threat to be guilty under this statute. *See, e.g. United States v. Cooper*, 523 F.2d 8, 10 (6th Cir. 1975).

4. On January 8, 2021, I was informed by the Calhoun County Sheriff's Office (CCSO) that an individual identifying himself as "Yankee Patriot" had made repeated threatening calls to the Calhoun County 911 line on January 5, 2021. The caller, later identified as Jonathan MUNAFO, placed approximately 143 calls demanding to speak with a deputy sheriff or sergeant, tying up the emergency line for several hours.

5. I have listened to approximately three hours of MUNAFO's calls, which were recorded by CCSO. MUNAFO advised the 911 dispatcher that he knew where she lived, and recited accurate information about her mortgage and tax obligations. MUNAFO told the

dispatcher that he would maim her, kill her, and attack her family if she did not put a deputy or sergeant on the line. In one call he demanded, “[P]ut a fucking cop on the phone now you stupid bitch, or it’s going to go way worse for your family!” In another he threatened, “[B]itch, I’m gonna cut your throat. I’m gonna make you eat your fucking nose. I’m gonna hurt you bad for this. It won’t be today, it won’t be tomorrow, it’ll be fucking soon though, you stupid cunt. Insurrection Act, I’m coming to your door first and it’s public knowledge, you stupid, stupid bitch!” MUNAFO was evidently aware he was breaking the law, stating, “Each one of these calls are gonna be like a charge, right? I’ll never see a judge.”

6. On or about January 6, 2021, CCSO Detective Jonathan Pignataro determined through public records that the phone number making the threat calls was issued by “Bandwidth.com,” an internet phone service provider. A representative of Bandwidth.com advised Det. Pignataro that the number was resold by another internet phone service provider, Textnow.com. Det. Pignataro served Textnow.com an emergency disclosure request, followed by a search warrant. Textnow.com provided the subscriber’s username, gmail address, and IP addresses used at the time of the threat calls, all of which were determined to belong to MUNAFO, as described below.

7. Also on January 6, 2021, Det. Pignataro served a search warrant on Google LLC, for the gmail account associated with the Textnow.com number. Google disclosed that the subscriber had provided the recovery e-mail address [jonathan.munafo@yahoo.com](mailto:jonathan.munafo@yahoo.com), and sign-in phone number (508) 418-9055.

8. On or about September 14, 2020, Massachusetts State Police received a report that a man in a car covered in “Trump” stickers threatened to shoot another man at a highway rest stop near Salisbury, Massachusetts. State Police traced the reported license plate, located

MUNAFO, and issued him a summons to appear in court. According to law enforcement records, MUNAFO failed to appear as directed. In response to the incident and issuance of the summons, on or about September 22, 2020, MUNAFO contacted the emergency line for the State Police post in Newberry, Massachusetts, approximately 21 times, during which he utilized vulgar language and yelled at Troopers. MUNAFO eventually stated he was mad about the incident from September 14, 2020, and believed he should not be in trouble for the events.

9. Location information provided by Google in response to Det. Pignataro's search warrant establishes that MUNAFO was at a truck stop in Dunn, North Carolina when he placed the threat calls to the Calhoun County Dispatcher on January 5, 2021.

10. In response to the Calhoun County search warrant, Google also provided MUNAFO's internet search history for January 5, 2021, the day before the assault on the U.S. Capitol. MUNAFO searched for information on "Calhoun sheriff Michigan." Among other search terms disclosed by Google, MUNAFO also searched for "Freedom Plaza, Washington, DC," several firearms and military surplus stores, and "Gretchen Whitmer" on January 4 and 5, 2021. His whereabouts are currently unknown.